



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

VIA FEDERAL EXPRESS

November 27, 2013

EPA CERCLA Section 104(e) Request for Information

Melvin Teitelbaum, Esq.
For Greve Financial Services, Inc.
7162 Beverly Blvd., #123
Los Angeles, CA 90036

Re: 104 (e) Request for Information – Omega Superfund Site
Angeles Chemical Co., Inc. Facility, 8915 Sorensen Avenue, Santa Fe Springs, CA

Dear Mr. Teitelbaum:

The United States Environmental Protection Agency ("EPA") is spending public funds to investigate and respond to the release or threatened release of hazardous substances into the soil and groundwater at the Omega Chemical Superfund Site (the "Site"). EPA previously issued Greve Financial Services, Inc. a General Notice for the real property located at 8915 Sorensen Avenue, Santa Fe Springs, CA under the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"), as amended, 42 U.S.C. §9601 *et seq.* The purpose of this letter is to obtain additional information on Greve Financial Services, Inc.'s current ability to pay for or perform future work.

We request that you provide a complete and truthful written response to this Information Request and questions in Enclosure B **within thirty (30) calendar days** of your receipt of this letter. Instructions on how to respond to the questions are described in Enclosure A. Please return your written response to:

Keith Olinger, SFD-7-5
U.S. Environmental Protection Agency, Region IX
Superfund Division
75 Hawthorne Street
San Francisco, California 94105

Under Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"), 42 U.S.C. §9604(e), EPA has broad information-gathering authority which allows EPA to require persons to furnish information or documents relating to:

- (a) The identification, nature, and quantity of materials which have been or are generated, treated, stored, or disposed of at a vessel or facility or transported to a vessel or facility;
- (b) The nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at or from a vessel or facility; and
- (c) Information relating to the ability of a person to pay for or perform a cleanup.

Please note that your compliance with this Information Request is mandatory. Failure to respond fully and truthfully may result in an enforcement action by EPA pursuant to Section 104(e)(5) of CERCLA, 42 U.S.C. §9604(e)(5). This statutory provision authorizes EPA to seek the imposition of penalties of up to \$37,500 per day of noncompliance. Please be further advised that provision of false, fictitious or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. §1001. The information you provide may be used by EPA in administrative, civil or criminal proceedings.

Some of the information EPA is requesting may be considered by you to be confidential business information (“CBI”), as described in Title 40 of the Code of Federal Regulations, Subchapter A, Part 2, Subpart B (40 C.F.R., §2.201, *et seq.*). Please be aware that you may not withhold the information upon that basis. If you wish EPA to treat the information confidentially, you must advise EPA of that fact by following the procedures outlined in Enclosure A, including the requirement for supporting your claim for confidentiality. Please be aware that EPA will maintain information consistent with the Privacy Act of 1974, 5 U.S.C. §552a, as amended.

This request for information is not subject to review by the Office of Management and Budget (“OMB”) under the Paperwork Reduction Act because it is not an “information collection request” within the meaning of 44 U.S.C. §§3502(3), 3507, 3512, and 3518(c)(1). See also 5 C.F.R. §§1320.3(c), 1320.4, and 1320.6(a). Furthermore, it is exempt from OMB review under the Paperwork Reduction Act because it is directed to fewer than ten persons. 44 U.S.C. §3502(4), (11); 5 C.F.R. §§1320.4 and 1320.6(a).

If you have questions regarding this Information Request, please contact Steve Berninger, Assistant Regional Counsel, at (415) 972-3909, or Keith Olinger, Enforcement Officer, at (415) 972-3125. If you have questions about the history of the Site, the nature of the environmental conditions at the Site, or the status of cleanup activities, please contact Lynda Deschambault at (415) 947-4183.

We appreciate and look forward to your prompt response to this Information Request.

Sincerely,

A handwritten signature in cursive script that reads "Kathi Moore".

Kathi Moore, Manager
Case Development/Cost Recovery Section
Site Cleanup Branch
Superfund Division

Enclosures (2):

- Enclosure A (Instructions and Definitions)
- Enclosure B (Information Request)

cc: Joseph E. Kennedy
Steve Berninger, EPA
Lynda Deschambault, EPA
Keith Olinger, EPA

ENCLOSURE A: INSTRUCTIONS AND DEFINITIONS

Instructions:

1. Answer Each Question Completely. A separate response must be made to each of the questions set forth in this Information Request. For each question contained in this letter, if information responsive to this Information Request is not in your possession, custody, or control, please identify the person(s) from whom such information may be obtained. For the definition of “you” and other terms, please see the Definitions section below.
2. Number Each Answer. When answering the questions in Enclosure B, please precede each answer with the corresponding number of the question and subpart to which it responds.
3. Number Each Document. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the question to which it corresponds.
4. Provide the Best Information Available. Provide responses to the best of Respondent's ability, even if the information sought was never put down in writing or if the written documents are no longer available. You should seek out responsive information from current and former employees/agents. Submission of cursory responses when other responsive information is available to the Respondent will be considered non-compliance with this Information Request.
5. Identify Sources of Answer. For each question, identify all the persons and documents that you relied on in producing your answer.
6. Continuing Obligation to Provide/Correct Information. If additional information or documents responsive to this Request become known or available to you after you respond to this Request, EPA hereby requests pursuant to CERCLA Section 104(e) that you supplement your response to EPA.
7. Scope of Request. The scope of this request includes all information and documents independently developed or obtained by research on the part of your company, its attorneys, consultants or any of their agents, consultants or employees.
8. Confidential Information. The information requested herein must be provided even though you may contend that it includes confidential information or trade secrets. You may assert a confidentiality claim covering part or all of the information requested, pursuant to Sections 104(e)(7)(E) and (F) of CERCLA, 42 U.S.C. §§9604(e)(7)(E) and (F), and Section 3007(b) of RCRA, 42 U.S.C. §6927(b), and 40 C.F.R. §2.203(b). If you make a claim of confidentiality for any of the information you submit to EPA, you must prove that claim. For each document or response you claim confidential, you must separately address the following points:

- a. clearly identify the portions of the information alleged to be entitled to confidential treatment;
 - b. the period of time for which confidential treatment is desired (e.g., until a certain date, until the occurrence of a specific event, or permanently);
 - c. measures taken by you to guard against the undesired disclosure of the information to others;
 - d. the extent to which the information has been disclosed to others, and the precautions taken in connection therewith;
 - e. pertinent confidentiality determinations, if any, by EPA or other federal agencies, and a copy of any such determinations or reference to them, if available; and
 - f. whether you assert that disclosure of the information would likely result in substantial harmful effects on your business' competitive position, and if so, what those harmful effects would be, why they should be viewed as substantial, and an explanation of the causal relationship between disclosure and such harmful effects.
 - g. To make a confidentiality claim, please stamp, or type, "confidential" on all confidential responses and any related confidential documents. Confidential portions of otherwise nonconfidential documents should be clearly identified. You should indicate a date, if any, after which the information need no longer be treated as confidential. Please submit your response so that all nonconfidential information, including any redacted versions of documents are in one envelope and all materials for which you desire confidential treatment are in another envelope.
 - h. All confidentiality claims are subject to EPA verification. It is important that you satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so, and that it is not and has not been obtainable by legitimate means without your consent. Information covered by such claim will be disclosed by EPA only to the extent permitted by CERCLA Section 104(e). If no such claim accompanies the information when it is received by EPA, then it may be made available to the public by EPA without further notice to you.
9. Disclosure to EPA's Authorized Representatives. Information which you submit in response to this Information Request may be disclosed by EPA to authorized representatives of the United States, pursuant to 40 C.F.R. 2.310(h), even if you assert that all or part of it is confidential business information. The authorized representatives of EPA to which EPA may disclose information contained in your response are as follows:

Department of Toxic Substances Control/
California Environmental Protection Agency

ENCLOSURE A

Toeroek Associates, Inc.
EPA Contract Number EP-BPA-11-W-001

CH2M Hill, Inc.
EPA RAC Contract Number EP-S9-08-04

Toeroek Herndon Joint Venture
EPA Contract Number EP-R9-12-02

ITSI, Inc.
EPA RAC Contract Number EP-S9-08-03

Techlaw
EPA ROC Contract Number EP-W-07-066

CB&I / Shaw Environmental & Infrastructure, Inc.
EPA RAC Contract Number EP-S9-13-02

Any subsequent additions or changes in EPA contractors who may have access to your response to this Information Request will be published in the Federal Register.

This information may be made available to these authorized representatives of EPA for any of the following reasons: to assist with document handling, inventory, and indexing; to assist with document review and analysis for verification of completeness; or to provide expert technical review of the contents of the response. Pursuant to 40 C.F.R. §2.310(h), you may submit comments on EPA's disclosure of any confidential information contained in your response by EPA to its authorized representatives along with the response itself, within the thirty (30) calendar day period in which the response is due.

10. Objections to Questions. If you have objections to some or all of the questions contained in the Information Request letter, you are still required to respond to each of the questions.

Definitions:

1. The term “you” or “Respondent” should be interpreted to include the addressee of this Information Request, and its officers, managers, employees, contractors, trustees, successors, assigns and agents.
2. The term “person” shall include any individual, firm, unincorporated association, partnership, corporation, trust, joint venture, or other entity.
3. The term “waste” or “wastes” shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, and pollutants or contaminants, whether solid, liquid, or sludge.

4. The term “hazardous waste” shall have the same definition as that contained in Section 1004(5) of RCRA.
5. The term “hazardous substance” shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
6. The term “release” has the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping or disposing into the environment, including the abandonment or discharging of barrels, containers and other closed receptacles containing any hazardous substance or pollutant or contaminant.
7. The term “pollutant or contaminant” shall have the same definition as that contained in Section 101(33) of CERCLA and include any mixtures of such pollutants and contaminants with any other substance including petroleum products.
8. The term “materials” shall mean all substances that have been generated, treated, stored, or disposed of or otherwise handled at or transported to the Site including, but not limited to, all hazardous substances, pollutants or contaminants.
9. The term “document” includes any written, recorded, computer generated or visually or aurally reproduced material of any kind in any medium in your possession, custody, or control or known by you to exist, including originals, all prior drafts, and all non-identical copies.

ENCLOSURE B: QUESTIONS (INFORMATION REQUEST)

Note: The term Property refers to the property located at 8915 Sorensen Avenue, Santa Fe Springs, California.

1. State the full legal name, address, telephone number, positions(s) held by, and tenure of, the individual(s) answering any of these questions on behalf of Greve Financial Services, Inc. concerning the matters set forth herein.
2. EPA information indicates that Greve Financial Services, Inc., a California corporation, was dissolved on March 19, 2012. Provide a Certificate of Dissolution and complete Articles of Dissolution. If Certificate of Dissolution and Articles of Dissolution are not available, please provide documents verifying that the company is dissolved and that all outstanding debts have been settled.
3. Describe the circumstances surrounding the dissolution of Greve Financial Services, Inc., including in your answer the following:
 - a. The exact date of dissolution;
 - b. The names and addresses of any and all shareholders at the time of dissolution;
 - c. The value of all assets distributed to each shareholder as a result of the dissolution;
 - d. The final disposition of all assets, liabilities, and shares of Greve Financial Services, Inc.;
 - e. The identity of all parties to any transactions relating to or arising out of the dissolution; and;
 - f. The identity of all documents relating to the dissolution.
4. Identify any successor corporations or other entities of Greve Financial Services, Inc.
5. If Greve Financial Services, Inc. was a subsidiary of another corporation, identify such other corporation and state the dates during which the parent/subsidiary relationship existed and the names and addresses of that corporation's president, chairman of the board and other officers.
6. Describe any asset purchase agreements, whereby some or all of the assets of Greve Financial Services, Inc. were ever sold to any other entity, including the date(s), the companies involved and the terms of such asset purchase agreement(s).
7. Provide sale agreements for the final sale and/or transfer of company assets at the time operations ceased. Assets include, but are not limited to, common stock, use of company name, inventory, property and equipment, real estate, and other assets. If sale agreements are not available, provide the following information about the disposition of the company assets: a description of the assets, the name of purchaser of the assets, the date of sale, and the price received for the assets.

8. Provide a list of all of Greve Financial Services, Inc.'s officers by name, title and dates of office from the date of incorporation to the present.
9. Provide a list of all of Greve Financial Services, Inc.'s directors from the date of incorporation to the present. Include the dates of service for each director.
10. Provide a list of all of Greve Financial Services, Inc.'s shareholders (5 percent interest or greater in the company) from the date of incorporation to the present. Include the name, current or most recent address and phone number of each shareholder. As part of your response, provide the number and type of shares held by each shareholder, as well as the percentage of the company owned by each identified shareholder for each year, beginning with the date of incorporation.
11. Describe the corporate affiliation between Greve Financial Services, Inc. and Fernal Properties Inc. Provide copies of all documentation evidencing such affiliation. As part of your response, also provide the following information:
 - a. State whether Greve Financial Services, Inc. was a parent corporation, subsidiary, unincorporated division or operating unit, affiliate, or sister entity of Fernal Properties Inc.
 - b. State whether Greve Financial Services, Inc. and Fernal Properties Inc. ever owned or had an interest in each other. If so, describe the nature and extent of any ownership interest and when and how such ownership interest was acquired. In addition, describe the nature of the sale and/or transaction reflecting this ownership interest. Provide copies of all documents evidencing the purchase of assets, along with all attachments and schedules and any and all financing documents, including security agreements, promissory notes and financing statements.
12. EPA information indicates that Fernal Properties Inc. was a creditor of Greve Financial Services, Inc. and foreclosed on the Property on February 1, 2011. Provide information clarifying the nature of this creditor/debtor relationship, including stating what claims and liens Fernal Properties Inc. had against Greve Financial Services, Inc. and providing the total amount of the debt owed by Greve Financial Services, Inc. to Fernal Properties Inc.
13. EPA has obtained a copy of the Trustee's Deed recorded February 3, 2011 conveying the Property to Fernal Properties Inc., which indicates that Fernal Properties Inc. paid \$2,033,593.67 in exchange for the Property. Please provide any and all documentation associated with the valuation of the Property in connection with this foreclosure, including any appraisal of the Property. Please provide the value of debt satisfaction of Fernal Properties Inc.'s claims against Greve Financial Services, Inc. that was attained by Fernal Properties Inc.'s acquisition of the Property through foreclosure proceedings.
14. Provide any corporate minutes of meetings of the board of directors or shareholders concerning, approving or ratifying the creditor/debtor agreement between Fernal Properties Inc. and Greve Financial Services, Inc.

15. State the amount that Greve Financial Services, Inc. received pursuant to the foreclosure sale of the Property on February 1, 2011, including any amount allotted to satisfaction of the claims of Greve Financial Services, Inc.'s creditors. Provide information as to how any proceeds have been spent or are planned to be used.
16. EPA has obtained a copy of the January 31, 2001 Agreement entered between Greve Financial Services, Inc. and Angeles Chemical Co., Inc. concerning certain funding of remediation at the Property. State whether Angeles Chemical Co., Inc. received proceeds from Greve Financial Services, Inc.'s sale of the property pursuant to the conditions set forth in paragraph 8. If the answer is "yes," provide the amount(s) and date(s) of payment, and describe how the proceeds have been spent or are planned to be used.



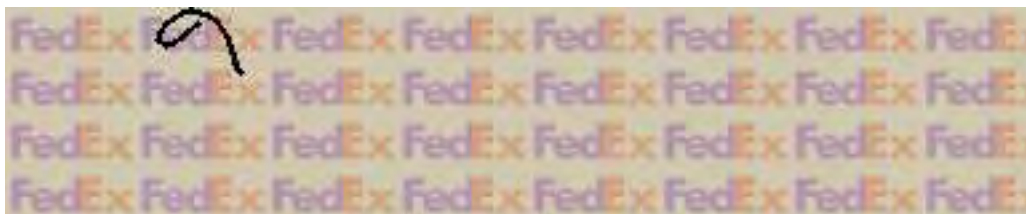
December 3, 2013

Dear Customer:

The following is the proof-of-delivery for tracking number **546221781594**.

Delivery Information:

Status:	Delivered	Delivered to:	Receptionist/Front Desk
Signed for by:	.SYLVIA	Delivery location:	7162 BEVERLY BLVD LOS ANGELES, CA 90036
Service type:	FedEx Priority Overnight	Delivery date:	Nov 29, 2013 10:18
Special Handling:	Deliver Weekday Direct Signature Required		



Shipping Information:

Tracking number:	546221781594	Ship date:	Nov 27, 2013
		Weight:	0.5 lbs/0.2 kg

Recipient:

Melvin Teitelbaum, Esq.
for Greve Financial Services, Inc.
7162 Beverly Blvd.
#123
LOS ANGELES, CA 90036 US

Reference**Shipper:**

Omega
Toeroek Associates, Inc.
1300 Clay Street
Suite 450
Oakland, CA 94612 US
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